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**VIA OVERNIGHT DELIVERY**

November 22, 2011

Ms. Kristine Koch  
Remedial Project Manager  
United States Environmental Protection Agency, Region 10  
Office of Environmental Cleanup, Mail Code ECL-115  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

Re: **Second Supplemental Response to First Request for Information to Phillips  
Oil Co. (i.e., Phillips Petroleum Company)  
Portland Harbor Superfund Site  
Portland, Oregon**

Dear Ms. Koch:

This letter and the accompanying supplemental responses are being submitted by ConocoPhillips Company ("ConocoPhillips"), on behalf of the former Phillips Petroleum Company (erroneously identified as Phillips Oil Company), to the EPA's First Request for Information letter, dated January 18, 2008, concerning the Portland Harbor Superfund Site (the "Site") in Portland, Oregon. This Second Supplemental Response relates specifically to the Portland Terminal located at 5528 N.W. Doane Avenue in the City of Portland.

ConocoPhillips has provided information regarding employees consulted in preparation of the response and requests that any contact with these employees be made through Paul Hamada, Senior Counsel, ConocoPhillips Company, ML 2080, 600 North Dairy Ashford, Houston, TX 77079, Phone 281-293-1036.

The request from the EPA required that ConocoPhillips' response be accompanied by a declaration from a company representative. It is ConocoPhillips' position that neither Section 104 of CERCLA nor Section 3007 of RCRA contains requirements that the information and documentation submitted in response to this request include a declaration

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of the type EPA requested. ConocoPhillips has made a diligent search of its records and conducted an investigation of its involvement with this Site, and we are confident that the responses contained herein are accurate to the extent that information is currently available.

ConocoPhillips will continue its efforts to locate additional information that may be responsive to this information request. Accordingly, nothing contained herein shall be interpreted or construed as an admission or waiver of any claims, rights or defenses of ConocoPhillips, and ConocoPhillips reserves any and all claims, rights and defenses relating to the matters addressed herein including the right to amend or supplement this response. Should such information or records be located or identified pursuant to these efforts, ConocoPhillips will provide supplements to this response.

Please direct any further communications regarding this matter to Willette A. DuBose, HS&E Legal Specialist, ConocoPhillips Company, ML 2070, Legal Downstream Group, 600 North Dairy Ashford, Houston, TX 77079, Phone (281) 293-6952.

Very truly yours,



Mark A. Aebe  
Manager, Environmental Risk  
Risk Management and Remediation  
ConocoPhillips Company

cc: Terry Lauck, Site Manager, RM&R, ConocoPhillips  
Ann Anderson, Claims Consultant, RM&R, ConocoPhillips  
Paul Hamada, Senior Counsel, Legal, ConocoPhillips  
Willette A. DuBose, HS&E Legal Specialist, Legal, ConocoPhillips

Nico van Aelstyn, Principal  
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456 Montgomery Street, Suite 1800  
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\*\*A copy of the document may be requested from the Superfund Records Center.

**\*Document Information\***

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Site Name: PORSF - Portland Harbor

**104(e) Response Phillips Oil Co. (Conoco-Phillips) 2<sup>nd</sup> Supplemental Response:  
DVD's (x2) Transmitting 2<sup>nd</sup> Supplemental Response and  
Supporting Document's to EPA's First Request for Information.  
(Contents of DVD's Have Been Processed and Uploaded Into SDMS)**